# UNITED STATES BANKRUPTCY COURT **DISTRICT OF NEW JERSEY** Caption in Compliance with D.N.J. LBR 9004-1(b) **BROWN RUDNICK LLP** HAYNES AND BOONE, LLP Kenneth J. Aulet, Esq. (admitted pro hac vice) Richard S. Kanowitz, Esq. (NJ Bar No. 047911992) Seven Times Square Lauren M. Sisson, Esq. (NJ Bar No. 394182022) New York, New York 10036 30 Rockefeller Plaza, 26th Floor (212) 209-4800 New York, New York 10112 kaulet@brownrudnick.com (212) 659-7300 richard.kanowitz@haynesboone.com **BROWN RUDNICK LLP** lauren.sisson@haynesboone.com Tristan Axelrod, Esq. (admitted *pro hac vice*) One Financial Center Attorneys for the Plan Administrator Boston, MA 02111 (617)856-8300 taxelrod@brownrudnick.com General Counsel for the Plan Administrator GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. 110 Allen Rd., Suite 304 Basking Ridge, NJ 07920 (973) 230-2095 DStolz@genovaburns.com DClarke@genovaburns.com Local Counsel for the Plan Administrator In re: Chapter 11 Case No. 22-19361 (MBK) (Jointly Administered under a Confirmed Plan<sup>2</sup>) BLOCKFI INC., et al.,

# NOTICE OF POTENTIAL SALE OF ALLOWED CLAIMS OF THE WIND-DOWN DEBTORS IN THE CHAPTER 11 PROCEEDINGS OF FTX TRADING, LTD. ET AL.

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Debtors.1

The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

On October 3, 2023, the Court entered an order confirming the *Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications)* (the "Plan") [Docket No. 1609].

- **PLEASE TAKE NOTICE** that the Plan Administrator for BlockFi Inc. and its debtor affiliates (collectively, "BlockFi" or the "Wind-Down Debtors") is currently contemplating the potential sale of certain claims held against FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the "FTX Debtors") in the jointly-administered chapter 11 cases proceeding under the caption *In re FTX Trading Ltd., et al.*, Case No. 22-11068 (JTD) (the "FTX Bankruptcy Proceedings").
- **PLEASE TAKE FURTHER NOTICE** that the claims held by the Wind-Down Debtors are Allowed claims against the FTX Debtors in the aggregate amount of approximately \$870 million, which are described in and subject to that certain *Global Settlement Agreement* between the Wind-Down Debtors and FTX Debtors (the "Global Settlement Agreement" describing the "FTX Claims").
- **PLEASE TAKE FURTHER NOTICE** that Global Settlement Agreement has been approved by this Court, Dkt. No. 2209, and in the FTX Bankruptcy Proceedings, FTX Dkt. No. 10331. The Global Settlement Agreement has likewise been approved by the Supreme Court of Bermuda. The Global Settlement Agreement is effective and the FTX Claims are Allowed in the FTX Bankruptcy Proceedings on a final basis.
- **PLEASE TAKE FURTHER NOTICE** that the Global Settlement Agreement provides for sale, transfer and assignment of the FTX Claims subject to the rights and obligations of the Wind-Down Debtors as stated therein.
- PLEASE TAKE FURTHER NOTICE that the Plan Administrator has begun outreach to interested parties concerning the potential sale, transfer and assignment of certain of the FTX Claims. The Wind-Down Debtors encourage any party interested in purchasing the FTX Claims or a material portion thereof to contact the Plan Administrator as provided below **as soon as possible**. Interested parties should be prepared to provide all requested materials not later than 11:00 a.m. EDT on July 1, 2024.
- PLEASE TAKE FURTHER NOTICE that any interested parties must demonstrate, to the satisfaction of the Plan Administrator, in his sole and absolute discretion, the ability to consummate a transaction, and the Plan Administrator reserves all rights to disregard any inquiry from a party that is, in the judgment of the Plan Administrator, not capable of consummating a transaction.
- **PLEASE TAKE FURTHER NOTICE** that the Plan Administrator, in his sole and absolute discretion, may provide additional direction to qualified parties regarding the process and terms of any potential sale. The Wind-Down Debtors reserve all rights concerning such terms and process, including without limitation the right to determine not to conduct or complete any contemplated sale.

IF YOU HAVE QUESTIONS OR WISH TO COMMUNICATE WITH THE PLAN ADMINISTRATOR CONCERNING A POTENTIAL PURCHASE OF THE FTX CLAIMS, PLEASE CONTACT THE PLAN ADMINISTRATOR AS FOLLOWS:

EMAIL: BLOCKFIFTXCLAIM@M3-PARTNERS.COM

TEL: (212) 202-2230

INQUIRIES SHOULD BE TRANSMITTED AS SOON AS POSSIBLE. INTERESTED PARTIES SHOULD BE PREPEARED TO PROVIDE ALL REQUESTED MATERIALS NOT LATER THAN 11:00 A.M. EDT ON <u>JULY 1, 2024</u>.

# **Additional Information**

Copies of the Global Settlement Agreement, the Order of this Court authorizing entry into the Global Settlement Agreement, or any other documents filed in the Debtors' Chapter 11 cases are available for free online at https://restructuring.ra.kroll.com/blockfi. Copies of these documents may also be obtained upon written request to the Debtors' Claims and Noticing Agent by mail at Kroll Restructuring Administration LLC, Attn: BlockFi Inquiries, 850 3rd Avenue, Suite 412, Brooklyn, New York 11232, or by email at blockfiinfo@ra.kroll.com. You may also obtain copies of any of the documents filed in the Debtors' Chapter 11 cases for a fee via PACER at http://www.njb.uscourts.gov.

# **Reservation of Rights**

NOTHING IN ANY NOTICE SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ANY RIGHTS OF THE WIND-DOWN DEBTORS WITH RESPECT TO THE FTX CLAIMS.

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Dated: June 24, 2024 /s/ Daniel M. Stolz

#### **GENOVA BURNS LLC**

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